

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**Consolidated Grain and Barge, Co.  
2801 Bluff Road  
Mt. Vernon, Indiana 47620**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F129-15422-00014	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 26, 2002  Expiration Date: June 26, 2007

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Grain merchandising plant

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a grain merchandising plant.

Authorized individual:	Michael Brown
Source Address:	2801 Bluff Road, Mt. Vernon, Indiana 47620
Mailing Address:	P. O. Box 547, Mt. Vernon, Indiana 47620-0547
SIC Code:	5153
Source Location Status:	Posey
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

#### Proposed Emission Units

- (a) One (1) North Merchandising House -
  - (1) One (1) Grain Storage Ring/Pad, known as P9B, with a capacity of 1 million bushel pile. This storage ring/pad will enable the source to better handle the large amount of grain that is received during fall harvest, which is a once per year fill.
  - (2) One (1) Overhead Totally Enclosed Conveyor, known as P8B, with a maximum rate of 336 tons per hour.

#### Permitted Emission Units

- (a) One (1) Truck Only Receiving Area, known as P1, installed in the first quarter of 1978, with a maximum design throughput of 840 tons of grain per hour, including receiving pits P1A, P1B, with emissions controlled by baghouse C-1 and exhausted to Stack S1, and receiving pit P1C, with emissions controlled by baghouse C-2 and exhausted to Stack S2.
- (b) One (1) Truck & Rail Receiving Area, known as P2, installed in the first quarter of 1978, with a maximum capacity: 420 tons of grain per hour.
- (c) One (1) Grain Handling Area, known as P3, exhausted to stack S-2, installed in 1979, controlled by baghouse C-2, capacity: 1,260 tons of grain per hour.

- (d) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, installed in 1994, rated at 36.0 million British thermal units per hour (mmBtu/hr), capacity: 84.0 tons of grain per hour.
- (e) One (1) Barge Loadout Area, known as P5, installed in the first quarter of 1978, controlled by a telescoping spout, capacity: 500 tons of grain per hour.
- (f) One (1), Truck Loadout Area, known as P6A, installed in the first quarter of 1978, controlled by a spout extension, capacity: 336 tons of grain per hour.
- (g) One (1) Truck and Rail Loadout Area, installed in 1978, known as P6B, controlled by a spout, capacity: 375 tons per hour.
- (h) One (1) North Merchandising House - Receiving, known as P7, capacity: 336 tons of grain per hour.
- (i) One (1) North Merchandising House - Conveying, known as P8, capacity: 336 tons of grain per hour.
- (j) One (1) North Merchandising House - Loadout, known as P9, capacity: 280 tons of grain per hour.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu/hr.
  - (1) Three (3) natural gas-fired combustion sources, installed in the first quarter of 1978, rated at 1.0 mmBtu/hr, each.
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (1) Two (2) storage tanks, installed in 1978, capacity: 500 gallons of fuel oil each.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee

shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015



Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
  
Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency

Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal** [326 IAC 2-8-3(h)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this

source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If

required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the

permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Proposed Emission Units

- (a) One (1) North Merchandising House -
  - (1) One (1) Grain Storage Ring/Pad, known as P9B, with a capacity of 1 million bushel pile. This storage ring/pad will enable the source to better handle the large amount of grain that is received during fall harvest, which is a once per year fill.
  - (2) One (1) Overhead Totally Enclosed Conveyor, known as P8B, with a maximum rate of 336 tons per hour.

#### Permitted Emission Units

- (a) One (1) Truck Only Receiving Area, known as P1, installed in the first quarter of 1978, with a maximum design throughput of 840 tons of grain per hour, including receiving pits P1A, P1B, with emissions controlled by baghouse C-1 and exhausted to Stack S1, and receiving pit P1C, with emissions controlled by baghouse C-2 and exhausted to Stack S2.
- (b) One (1) Truck & Rail Receiving Area, known as P2, installed in the first quarter of 1978, with a maximum capacity: 420 tons of grain per hour.
- (c) One (1) Grain Handling Area, known as P3, exhausted to stack S-2, installed in 1979, controlled by baghouse C-2, capacity: 1,260 tons of grain per hour.
- (d) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, installed in 1994, rated at 36.0 million British thermal units per hour (mmBtu/hr), capacity: 84.0 tons of grain per hour.
- (e) One (1) Barge Loadout Area, known as P5, installed in the first quarter of 1978, controlled by a telescoping spout, capacity: 500 tons of grain per hour.
- (f) One (1), Truck Loadout Area, known as P6A, installed in the first quarter of 1978, controlled by a spout extension, capacity: 336 tons of grain per hour.
- (g) One (1) Truck and Rail Loadout Area, installed in 1978, known as P6B, controlled by a spout, capacity: 375 tons per hour.
- (h) One (1) North Merchandising House - Receiving, known as P7, capacity: 336 tons of grain per hour.
- (i) One (1) North Merchandising House - Conveying, known as P8, capacity: 336 tons of grain per hour.
- (j) One (1) North Merchandising House - Loadout, known as P9, capacity: 280 tons of grain per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter Less than Ten Microns (PM10) and PM [326 IAC 2-8] [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to 326 IAC 2-8, the sourcewide PM10 and PM emissions rate shall be limited to the

following:

Process/facility	PM Emission Limits (pounds/hour)	PM-10 Emission Limits (pounds/hour)
<b>Proposed:</b>		
One (1) North Merchandising House - Loadout -Grain Storage Ring/Pad (P9B)	0.22	0.04
Enclosed Conveyor (P8B)	0.40	0.2
<b>Existing</b>		
Truck Only Receiving Process (P1)	2.0	0.40
Rail/H.B. and Hopper Truck Receiving (P2)	6.2	1.1
Grain Handling (P3)	0.53	0.24
Grain Dryer (P4)	6.0	1.14
Grain Barge Loadout (P5)	19.3	9.4
Grain Truck Loadout (P6A)	9.1	4.3
Truck and Rail Loadout Area (P6B)	9.1	4.3
Bin Loading - North Merchandising House Receiving (P7)	0.22	0.04
Conveying (P8)	0.4	0.2
Loadout (P9)	0.54	0.14
Receiving Pit (P1C)	2.0	0.42
<b>Total Limited Emissions</b>	<b>56.01</b>	<b>22.0</b>

Compliance with the PM10 limits shall make 326 IAC 2-7, Part 70 Permit Program and 326 IAC 2-2 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD) not applicable. Compliance with the PM limits shall make 326 IAC 2-2 and 40 CFR 52.21, PSD not applicable.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emission rate from the grain merchandising plant shall be limited as follows:

Process/facility	Process Weight (tons/hour)	PM Emission Limits (pounds/hour)
P1, P2, P3	1260	80.6 total
P4	84	49.5
P5	500	69
P6A	336	64.3

P6B	375	65.6
P7, P8, P8B	336	64.3 total
P9	375	65.6
P9B	336	64.3

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where: } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons}$$

The PM limits in Condition D.1.1 shall override the above PM limits.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Truck Only Receiving (P1A & P1B), Receiving Pit (P1C), and the Grain Handling Areas, and their baghouses.

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 90 and 180 days after issuance of this permit, in order to establish the operating parameters for the baghouses used in conjunction with the Truck Only Receiving (P1A & P1B), Receiving Pit (P1C) and the Grain Handling Areas, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.1.5 Particulate Matter (PM)

The baghouses, telescoping spout and spouts for PM and PM10 control shall be in operation at all times when P1 (P1A, P1B, P1C); P3; P5; P6A and P6B are in operation.

### Compliance Monitoring Requirements

#### D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of S-1, S-2 and S-4 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency

and response steps for when an abnormal emission is observed.

#### **D.1.7 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the grain merchandising operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **D.1.8 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **D.1.9 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Truck Only Receiving (P1A & P1B), Receiving Pit (P1C), and the Grain Handling Areas, at least once per day when the Truck Only Receiving (P1A & P1B), Receiving Pit (P1C), and the Grain Handling Areas, are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

### **Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the S-1, S-2 and S-4 stack exhaust.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain the following:

Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

- (1) Inlet and outlet differential static pressure; and
- (2) Cleaning cycle: frequency and differential pressure.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the baghouse inspections and the dates the vents are redirected into the atmosphere.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Consolidated Grain and Barge Co.  
Source Address: 2801 Bluff Road, Mt. Vernon, Indiana 47620  
Mailing Address: P. O. Box 548, Mt. Vernon, Indiana 47620  
FESOP No.: 129-15422-00014

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Consolidated Grain and Barge Co.  
Source Address: 2801 Bluff Road, Mt. Vernon, Indiana 47620  
Mailing Address: P. O. Box 548, Mt. Vernon, Indiana 47620  
FESOP No.: 129-15422-00014

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)<br/>cThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<br/>cThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</p> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Consolidated Grain and Barge Co.  
Source Address: 2801 Bluff Road, Mt. Vernon, Indiana 47620  
Mailing Address: P. O. Box 548, Mt. Vernon, Indiana 47620  
FESOP No.: 129-15422-00014

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management**  
**Office of Air Quality**  
 Technical Support Document (TSD) for a Federally Enforceable State  
 Operating Permit (FESOP)

**Source Background and Description**

Source Name:	Consolidated Grain and Barge Co.	
Source Location:	2801 Bluff Road, Mt. Vernon, Indiana	
County:	Posey	
SIC Code:	5153	
FESOP No.:	129-15422-00014	
MSOP No.:	129-12259-00014	Issuance Date: September 12, 2000
Permit Reviewer:	Aida De Guzman	

The Office of Air Quality (OAQ) has reviewed an application from Consolidated Grain and Barge Co., a grain merchandising plant relating to the construction and operation of the following emission units:

**Proposed Emission Units**

- (a) One (1) North Merchandising House -
  - (1) One (1) Grain Storage Ring/Pad, known as P9B, with a capacity of 1 million bushel pile. This storage ring/pad will enable the source to better handle the large amount of grain that is received during fall harvest, which is a once per year fill.
  - (2) One (1) Overhead Totally Enclosed Conveyor, known as P8B, with a maximum rate of 336 tons per hour.

**Permitted Emission Units**

- (a) One (1) Truck Only Receiving Area, known as P1, installed in the first quarter of 1978, with a maximum design throughput of 840 tons of grain per hour, including receiving pits P1A, P1B, with emissions controlled by baghouse C-1 and exhausted to Stack S1, and receiving pit P1C, with emissions controlled by baghouse C-2 and exhausted to Stack S2.
- (b) One (1) Truck & Rail Receiving Area, known as P2, installed in the first quarter of 1978, with a maximum capacity: 420 tons of grain per hour.
- (c) One (1) Grain Handling Area, known as P3, exhausted to stack S-2, installed in 1979, controlled by baghouse C-2, capacity: 1,260 tons of grain per hour.
- (d) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, installed in 1994, rated at 36.0 million British thermal units per hour (mmBtu/hr), capacity: 84.0 tons of grain per hour.
- (e) One (1) Barge Loadout Area, known as P5, installed in the first quarter of 1978, controlled by a telescoping spout, capacity: 500 tons of grain per hour.
- (f) One (1), Truck Loadout Area, known as P6A, installed in the first quarter of 1978, controlled by a spout extension, capacity: 336 tons of grain per hour.
- (g) One (1) Truck and Rail Loadout Area, installed in 1978, known as P6B, controlled by a spout, capacity: 375 tons per hour.
- (h) One (1) North Merchandising House - Receiving, known as P7, capacity: 336 tons of grain per hour.

- (i) One (1) North Merchandising House - Conveying, known as P8, capacity: 336 tons of grain per hour.
- (j) One (1) North Merchandising House - Loadout, known as P9, capacity: 280 tons of grain per hour.

#### **Insignificant Activities:**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu/hr.
  - (1) Three (3) natural gas-fired combustion sources, installed in the first quarter of 1978, rated at 1.0 mmBtu/hr, each.
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (1) Two (2) storage tanks, installed in 1978, capacity: 500 gallons of fuel oil each.

#### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Minor Source Operating Permit (MSOP129-12259-00014) , issued on September 12, 2000; and
- (b) Significant Permit Revision 129-13957, issued on June 5, 2001.

#### **Source Definition**

Review Request 129-11237-00014 and MSOP 129-12259-00014 for Consolidated Grain and Barge Company have determined that a merchandising house located near the soybean oil extraction plant is a separate source. The merchandising house and soybean oil extraction plant are considered separate sources based on the following:

- (a) The two (2) sources have different Standard Industrial Classification (SIC) codes. The SIC code for the soybean extraction plant is 2057, and the SIC code for the merchandising house is 5153.
- (b) Less than fifty percent (50%) of the soybeans processed at the extraction plant are stored at the merchandising house storage area for any length of time.

#### **Recommendation**

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

The source initially submitted a complete application for the revision of their issued MSOP on April 2, 2002. However, the source status had changed into a Part 70 source. The source submitted their decision that they intend to operate under a FESOP and sent via e-mail on April 24, 2002.

#### **Emission Calculations**

##### **Proposed Emission Units:**

Using the AP-42 Table 9-9.1-1, November 1995 version.

- (a) Conveying (P8B) -

SCC 3-02-005-30

PM Ef	=	0.061 lb/ton
PM10 Ef	=	0.034 lb/ton
Maximum Unloading Rate	=	28,000 tons/yr

UNCONTROLLED EMISSIONS:

PM Emissions	=	28,000 tons/yr * 0.061 lb/ton * ton/2000 lb
	=	0.85 ton/yr

PM10 Emissions	=	28,000 tons/yr * 0.034 lb/ton * ton/2000 lb
	=	0.476 ton/yr

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions are similar to controlled emissions.

- (b) Loadout -Grain Storage Ring/Pad (P9B)- This pad will be filled via an existing truck receiving pit and an existing bucket elevator leg. This pad was installed to better handle the large amount of grain that is received during fall harvest. Thus storage unit is a "once per year fill only". The plant maximum throughput will not change as a result of this modification.

Hopper Truck Loadout:

SCC 3-02-005-51

PM Ef	=	0.035 lb/ton
PM10 Ef	=	0.0078 lb/ton
Maximum Unloading Rate	=	28,000 tons/yr

UNCONTROLLED EMISSIONS:

PM Emissions	=	28,000 ton/yr * 0.035 lb/ton * ton/2000 lb
	=	0.49 tons/yr

PM10 Emissions	=	28,000 tons/yr * 0.0078 lb/ton * ton/2000 lb
	=	0.11 ton/yr

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions are similar to controlled emissions.

**Permitted Emission Units:**

- (a) One (1) 36 mmBtu/hr natural gas-fired Grain Dryer: See Page 1 of 1 TSD Appendix A for detailed emission calculations.
- (b) Two (2) 500 Gallon Fuel Oil Storage Tanks: The emissions from these tanks are not quantifiable using the Tanks Program, because the tanks are small.

For existing country grain elevators, the EPA has determined that a reasonable and realistic "upper limit" estimate of the number of bushels of grain produced to be delivered to the elevator may be considered in identifying the "maximum capacity" of such elevators for the purpose of estimating their potential to emit. The EPA recommends that the PTE be determined based upon an estimate of the maximum amount of grain that could be received during a record crop

year in the geographic area served by the elevator. The EPA believes that the highest amount of grain received during the previous 5 years, multiplied by 1.2, will constitute a realistic upper bound on the amount of grain a country elevator could receive. Although this calculation would result in a PTE of 18 million bushels per year the source has requested a 28 million bushels per year (784,000 tons/yr) limit.

The following operation were permitted in MSOP 129-12259-00014, issued on September 12, 2000:

(a) One Truck Only Receiving Process (P1):  
SCC 3-02-005-51

PM Ef	=	0.18 lb/ton
PM10 Ef	=	0.059 lb/ton
Maximum Unloading Rate	=	784,000 tons/yr
Dust Collector Control Efficiency	=	95%

UNCONTROLLED EMISSIONS:

PM Emissions	=	784,000 tons/yr * 0.18 lb/ton * ton/2000 lb
	=	70.56 tons/yr
PM10 Emissions	=	784,000 tons/yr * 0.059 lb/ton * ton/2000 lb
	=	23.12 tons/yr

CONTROLLED EMISSIONS:

PM Emissions	=	70.56 tons/yr * (1 - 0.95)
	=	3.5 tons/yr
PM10 Emissions	=	23.12 tons/yr (1 - 0.95)
	=	1.15 ton/yr

(b) Rail/H.B. and Hopper Truck Receiving P2:  
SCC 3-02-005-512

PM Ef	=	0.035 lb/ton
PM10 Ef	=	0.0078 lb/ton
Maximum Unloading Rate	=	784,000 tons/yr

UNCONTROLLED EMISSIONS:

PM Emissions	=	784,000 tons/yr * 0.035 lb/ton * ton/2000 lb
	=	13.72 tons/yr
PM10 Emissions	=	784,000 tons/yr * 0.0078 lb/ton * ton/2000 lb
	=	3.05 tons/yr

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions are similar to controlled emissions.

(c) Grain Handling (P3):  
SCC 3-02-005-30

PM Ef	=	0.061 lb/ton
PM10 Ef	=	0.034 lb/ton
Maximum Unloading Rate	=	784,000 tons/yr
Dust Collector Control Efficiency	=	95%

UNCONTROLLED EMISSIONS:

PM Emissions	=	784,000 tons/yr * 0.061 lb/ton
	=	* ton/2000 lb
	=	23.9 tons/yr

PM10 Emissions	=	784,000 tons/yr * 0.034 lb/ton
	=	* ton/2000 lb
	=	13.3 tons/yr

CONTROLLED EMISSIONS:

PM Emissions	=	23.9 tons/yr (1 - 0.95)
	=	1.19 tons/yr

PM10 Emissions	=	13.3 tons/yr (1 - 0.95)
	=	0.67 ton/yr

(d) Grain Dryer (P4):  
SCC 3-02-005-04

PM Ef	=	0.22 lb/ton
PM10 Ef	=	25% of PM = 0.055 lb/ton
Maximum Rate	=	117,600 tons/yr

UNCONTROLLED EMISSIONS:

PM Emissions	=	117,600 tons/yr * 0.22 lb/ton
	=	* ton/2000 lb
	=	12.9 tons/yr

PM10 Emissions	=	117,600 tons/yr * 0.055 lb/ton
	=	* ton/2000 lb
	=	3.23 tons/yr

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions are similar to controlled emissions.

(e) Grain Barge Loadout (P5):

PM Ef	=	0.11 lb/ton
PM10 Ef	=	0.068 lb/ton
Maximum Rate	=	784,000 tons/yr

UNCONTROLLED EMISSIONS:

PM Emissions	=	784,000 tons/yr * 0.11 lb/ton
	=	* ton/2000 lb
	=	43.12 tons/yr

PM10 Emissions	=	784,000 tons/yr * 0.068 lb/ton
	=	* ton/2000 lb
	=	26.7 tons/yr

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions are similar to controlled emissions.

(f) Grain Truck Loadout (P6A):  
SCC 3-02-005-60

PM Ef	=	0.086 lb/ton
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PM10 Ef	=	0.029 lb/ton
Maximum Rate	=	784,000 tons/yr
Spout Extension Control Efficiency	=	40%

UNCONTROLLED EMISSIONS:

PM Emissions	=	784,000 tons/yr * 0.086 lb/ton
	=	* ton/2000 lb
	=	33.7 tons/yr

PM10 Emissions	=	784,000 tons/yr * 0.029 lb/ton
	=	* ton/2000 lb
	=	11.36 tons/yr

CONTROLLED EMISSIONS:

PM Emissions	=	33.7 tons/yr (1 - 0.40)
	=	20.22 tons/yr

PM10 Emissions	=	20.22 tons/yr (1 - 0.40)
	=	12.13 tons/yr

(g) Truck and Rail Loadout Area (P6B):

Using the worse emission factor between truck and rail loadout

PM Ef	=	0.086 lb/ton
PM10 Ef	=	0.029 lb/ton
Maximum Rate	=	784,000 tons/yr
Spout Extension Control Efficiency	=	40%

UNCONTROLLED EMISSIONS:

PM Emissions	=	784,000 tons/yr * 0.086 lb/ton
	=	* ton/2000 lb
	=	33.7 tons/yr

PM10 Emissions	=	784,000 tons/yr * 0.029 lb/ton
	=	* ton/2000 lb
	=	11.36 tons/yr

CONTROLLED EMISSIONS:

PM Emissions	=	33.7 tons/yr (1 - 0.40)
	=	20.22 tons/yr

PM10 Emissions	=	20.22 tons/yr (1 - 0.40)
	=	12.13 tons/yr

(h) Bin Loading - North Merchandising House:

(1) Receiving (P7) -

UNCONTROLLED EMISSIONS:

PM Emissions	=	28,000 tons/yr * 0.035 lb/ton
	=	* ton/2000 lb
	=	0.49 ton/yr

PM10 Emissions	=	28,000 tons/yr * 0.0078 lb/ton
	=	* ton/2000 lb
	=	0.11 ton/yr

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions



are similar to controlled emissions.

(2) Conveying (P8) -

UNCONTROLLED EMISSIONS:

$$\begin{aligned}\text{PM Emissions} &= 28,000 \text{ tons/yr} * 0.061 \text{ lb/ton} \\ &\quad * \text{ton/2000 lb} \\ &= 0.85 \text{ ton/yr}\end{aligned}$$

$$\begin{aligned}\text{PM}_{10} \text{ Emissions} &= 28,000 \text{ tons/yr} * 0.034 \text{ lb/ton} \\ &\quad * \text{ton/2000 lb} \\ &= 0.476 \text{ ton/yr}\end{aligned}$$

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions are similar to controlled emissions.

(3) Loadout (P9) -

UNCONTROLLED EMISSIONS:

$$\begin{aligned}\text{PM Emissions} &= 28,000 \text{ tons/yr} * 0.086 \text{ lb/ton} \\ &\quad * \text{ton/2000 lb} \\ &= 1.2 \text{ ton/yr}\end{aligned}$$

$$\begin{aligned}\text{PM}_{10} \text{ Emissions} &= 28,000 \text{ tons/yr} * 0.029 \text{ lb/ton} \\ &\quad * \text{ton/2000 lb} \\ &= 0.406 \text{ ton/yr}\end{aligned}$$

CONTROLLED EMISSIONS:

There is no emission control for this operation, therefore uncontrolled emissions are similar to controlled emissions.

(i) Receiving Pit (P1C) -

Permitted in Significant Permit Revision 129-13957-00014, issued on June 5, 2001.

UNCONTROLLED EMISSIONS:

$$\begin{aligned}\text{PM Emissions} &= 784,000 \text{ tons/yr} * 0.18 \text{ lb/ton} \\ &\quad * \text{ton/2000 lb} \\ &= 70.56 \text{ tons/yr}\end{aligned}$$

$$\begin{aligned}\text{PM}_{10} \text{ Emissions} &= 784,000 \text{ tons/yr} * 0.059 \text{ lb/ton} \\ &\quad * \text{ton/2000 lb} \\ &= 23.13 \text{ tons/yr}\end{aligned}$$

CONTROLLED EMISSIONS:

$$\begin{aligned}\text{PM Emissions} &= 70.56 \text{ tons/yr} * (1 - 0.95) \\ &= 3.53 \text{ tons/yr}\end{aligned}$$

$$\begin{aligned}\text{PM}_{10} \text{ Emissions} &= 23.13 \text{ tons PM}_{10}/\text{yr} * (1 - 0.95) \\ &= 1.16 \text{ tons/yr}\end{aligned}$$

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	326.26
PM-10	128.96
SO <sub>2</sub>	0.008
VOC	0.072
CO	1.104
NO <sub>x</sub>	1.314

### Justification for the Approval Level

The source is subject to Part 70 Permit Program, since the PM10 Potential To Emit are at levels greater than 100 tons per year. The source however, chose to limit the PM10 emissions to less than 100 tons per year and be permitted under the Federally Enforceable State Operating Permit (FESOP).

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ Emission Data:

Pollutant	Actual Emissions (tons/year)
PM	23.4
PM-10	6.15
SO <sub>2</sub>	0.00
VOC	0.00
CO	0.00
NO <sub>x</sub>	0.00
HAP	0.00

### Limited Potential to Emit

Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
<b>Proposed:</b>							
Loadout -Grain Storage Ring/Pad (P9B)	0.49	0.11	0.0	0.0	0.0	0.0	0.0
Enclosed Conveyor (P8B)	0.85	0.476	0.0	0.0	0.0	0.0	0.0
<b>Existing:</b>							
Truck Only Receiving Process (P1)	3.5	1.15	0.0	0.0	0.0	0.0	0.0
Rail/H.B. and Hopper Truck Receiving (P2)	13.72	3.05	0.0	0.0	0.0	0.0	0.0
Grain Handling (P3)	1.19	0.67	0.0	0.0	0.0	0.0	0.0
Grain Dryer (P4)	12.9	3.23	0.0	0.0	0.0	0.0	0.0
Grain Barge Loadout (P5)	43.12	26.7	0.0	0.0	0.0	0.0	0.0
Grain Truck Loadout (P6A)	20.22	12.13	0.0	0.0	0.0	0.0	0.0
Truck and Rail Loadout Area (P6B)	20.22	12.13	0.0	0.0	0.0	0.0	0.0

Bin Loading - North Merchandising House							
Receiving (P7)	0.49	0.11	0.0	0.0	0.0	0.0	0.0
Conveying (P8)	0.85	0.476	0.0	0.0	0.0	0.0	0.0
Loadout (P9)	1.2	0.406	0.0	0.0	0.0	0.0	0.0
Receiving Pit (P1C)	3.53	1.16	0.0	0.0	0.0	0.0	0.0
Natural Gas Combustion	3.025	1.3	0.108	0.162	14.3	17.1	-
Total Controlled Emissions	125.3	63.09	0.108	0.162	14.3	17.1	-Part
Part 70 Threshold Levels	-	100	100	100	100	100	25 combined 10 single
PSD Threshold Levels	250	250	250	250	250	250	-

- (a) This existing source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The existing MSOP source is being upgraded into a Part 70 source, but the source has decided to operate under a Federally Enforceable State Operating Permit.

### County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not designated

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Posey County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Part 70 Permit Determination

This existing source has been issued a Minor Source Operating Permit (MSOP) 129-12259-00014 on September 12, 2000. The source status has been upgraded into a Part 70 source, because its PM10 Potential to Emit is greater than 100 tons per year. The source however, chose to operate under a FESOP.

### Federal Rule Applicability

- (a) New Source Performance Standards (NSPS)
- (1) 40 CFR 60, Subpart DD - Standard of Performance for Grain Elevators. This NSPS does not apply to the existing facilities since construction was initiated before the August 3, 1978 applicability date. The Grain Handling Area, P3, installed in 1979 did not increase the hourly grain handling capacity and therefore is exempt pursuant to 40 CFR 60.304(b)(4).

- (2) The MSOP determined that facilities P7, P8 and P9 not subject to 40 CFR 60, Subpart DD. Since the P7, P8 and P9 stand alone, have a permanent storage capacity less then 2.5 million bushels, and are not part of a grain terminal elevator, they are not regulated by 40 CFR 60 Subpart DD.
- (3) The proposed Grain Storage Ring/Pad, known as P9B, and Overhead Totally Enclosed Conveyor, known as P8B are not subject to 40 CFR 60, Subpart DD, since they would be part of P8 and P9, which were determined to be not subject to this NSPS.
- (b) 40 CFR Part 60.110, Subpart K; Part 60.110a, Subpart Ka; and Part 60.110b, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels. The two (2) storage tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, 60.110a and 60.110b), Subparts K, Ka, and Kb, because each tank has a capacity less than 40 cubic meters.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

#### State Rule Applicability - Entire Source

- (a) IAC 1-6-3 (Preventive Maintenance Plan)  
A Preventive Maintenance Plan (PMP) is required for the Grain Barge Loadout (P5) because it has a control and the controlled PM allowable emission exceeds 10.0 pounds per hour.
- (b) 326 IAC 2-6 (Emission Reporting)  
This source is located in Posey County and the potential to emit PM<sub>10</sub> is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.
- (c) 326 IAC 5-1 (Visible Emissions Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (d) 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (PSD)  
The source PM10 emissions will be limited to less than 100 tons per year to avoid the applicability 326 IAC 2-7, Part 70 and 326 IAC 2-2, PSD requirements. The PM emissions will be limited to less than 250 tons per year to avoid the applicability of 326 IAC 2-2, PSD requirements. These limits will be in terms of pounds of emissions per hour (lbs/hr) and prorated based on each facility emission.

Table 1

Limited PTE		
Process/facility	PM (pounds/hour)	PM-10 (pounds/hour)
<b>Proposed:</b>		
Loadout -Grain Storage Ring/Pad (P9B)	0.22	0.04
Enclosed Conveyor (P8B)	0.40	0.2
<b>Existing</b>		

Truck Only Receiving Process (P1)	2.0	0.40
Rail/H.B. and Hopper Truck Receiving (P2)	6.2	1.1
Grain Handling (P3)	0.53	0.24
Grain Dryer (P4)	6.0	1.14
Grain Barge Loadout (P5)	19.3	9.4
Grain Truck Loadout (P6A)	9.1	4.3
Truck and Rail Loadout Area (P6B)	9.1	4.3
Bin Loading - North Merchandising House Receiving (P7) Conveying (P8) Loadout (P9)	0.22 0.4 0.54	0.04 0.2 0.14
Receiving Pit (P1C)	2.0	0.42
<b>Total Limited Emissions</b>	<b>56.01</b>	<b>22.0</b>

- (1) Baghouses C-1 and C-2 shall be in operation at all times P1 (P1A, P1B and P1C), and P3 are in operation, in order to comply with the limit.
- (2) The telescoping spout shall be in operation at all times P5 is in operation, in order to comply with the limit.
- (3) The spout shall be in operation at all times P6A is in operation, in order to comply with the limit.
- (4) The baghouse shall be in operation at all times P6B is in operation, in order to comply with the limit.

Methodology:

PM Limit =  $\frac{\text{Facility controlled PM emissions (249 tons/yr - 3.03 tons/yr nat.gas)}}{\text{Sourcewide controlled PM emissions}}$

PM10 Limit =  $\frac{\text{Facility controlled PM10 emissions (99 tons/yr - 1.3 tons/yr nat.gas)}}{\text{Sourcewide controlled PM10 emissions}}$

### State Rule Applicability - Individual Facilities

- (a) 326 IAC 6-3-2 (Process Operations)  
This rule mandates PM emission limits from the following facilities using below equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

Table 2

Facility/ID	Process Weight (tons/hour)	PM Limit (pounds/hour)
P1, P2, P3	1260	80.6 total
P4	84	49.5
P5	500	69
P6A	336	64.3
P6B	375	65.6
P7, P8, P8B	336	64.3 total

P9	375	65.6
P9B	336	64.3

The PM limits in Table 1 would override the limits for 326 IAC 6-3, since they are more stringent than the PM limits in Table 2.

- (b) 326 IAC 6-4 (Fugitive Dust Emissions)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), visible emissions shall not cross the property line of the source at or near ground level.

## Compliance Monitoring

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following compliance requirements from the source issued MSOP 129-12259-00014 are being incorporated into this FESOP. Compliance Monitoring is required since "a condition limiting the PTE is the only thing keeping the source out of an applicable requirements". Equipment added are **bolded**, since the same applicable requirements will apply, and deletions are ~~struck-through~~ for emphasis:

### 1. Visible Emissions Notations

- (a) Daily visible emission notations of S-1, S-2 and S-4 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### 2. Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grain merchandising operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months

thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

### 3. Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### 4. Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Truck Only Receiving (**P1A & P1B**), **Receiving Pit (P1C)**, and the Grain Handling Areas, at least once per day when the truck only receiving and the grain handling processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

### Compliance Determination Requirements

Pursuant to "FESOP Stack Testing Criteria" dated February 15, 2002, Stack Testing will be required for the baghouses used in conjunction with the Truck Only Receiving (P1A & P1B), Receiving Pit (P1C) and the Grain Handling Areas, "to develop correlation between the control devices parameter and emissions". Condition is as follows:

#### 1. Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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During the period between 90 and 180 days after issuance of this permit, in order to establish the operating parameters for the baghouses used in conjunction with the Truck Only Receiving (P1A & P1B), Receiving Pit (P1C) and the Grain Handling Areas, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

### Conclusion

The operation of this grain merchandising plant shall be subject to the conditions of the attached **Federally Enforceable State Operating Permit 129-15422-00014.**

